UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

SUBJECT:	CLEAN AIR ACT INSPECTION REPORT Super Steel LLC, Mequon, WI
FROM:	Meaghan Pashen, Environmental Engineer AECAB (MN/OH)
THRU:	Brian Dickens, Section Supervisor AECAB (MN/OH)
TO:	File

BASIC INFORMATION

Facility Name: Super Steel LLC

Facility Location: 10910 N Industrial Drive, Mequon, WI 53092

Date of Inspection: August 25, 2022

EPA Inspector(s):
1. Meaghan Pashen, Environmental Engineer
2. Karina Kuc, Environmental Engineer
3. Brittany Cobb, Environmental Engineer

Other Attendees:
1. Dale Willis, Vice President of Operations
2. Dan Brook, Vice President of Engineering
3. John Rau, EHS Consultant

Contact Email Address: john@janard.net

Purpose of Inspection: To determine facility compliance with National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 C.F.R. Part 63, Subpart XXXXXX (6X)) and Part 70 Permit

Facility Type: Fabricated metal product manufacturing and finishing

Regulations Central to Inspection: NESHAP Subpart 6X, including the obligation to implement practices to minimize the emission of metal fabrication hazardous air pollutants (MFHAPs) during welding, and the Facility's Part 70 Permit, including the obligation to minimize the emission of volatile organic compounds (VOCs) and particulate matter (PM) with respect to painting processes and ensure proper operation of all emission control devices

Arrival Time: 3:25 PM
Departure Time: 5:00 PM

Inspection Type:
☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☐ Provided Small Business Resource Information Sheet
☒ Small Business Resource Information Sheet not provided. Reason: Provided with Inspection Report
☒ Provided CBI warning to facility

The following information was obtained verbally from Dan Brook, Dale Willis, and/or John Rau unless otherwise noted.

Process Description:
Super Steel LLC (the Facility) is a fabricated metal product manufacturing and finishing facility. Raw material is sheet steel of various grades. The Facility processes steel that contains MFHAPs, including manganese, chromium, lead, nickel, and cadmium. Steel is cut, via laser and plasma cutting. Steel is cleaned with a degreaser. There are two laser cutters: a CO_2 cutter and a fiber cutter. The CO_2 cutter system exhausts outdoors and there is no dust collection system. The fiber cutter has a dust collection system that automatically indicates when the filters need to be changed. There is a dust collection system at the plasma cutter that exhausts indoors, but there is no differential pressure gauge.

There are approximately 50 to 60 welding stations. Tig is used in welding operations. There are three wet paint booths (spray booths) and one powder paint booth. All paint booths have fabric filters for PM control from paint spraying. There are manometers on all the paint booths which are monitored to inform when filters need to be replaced. The powder paint booth exhausts inside. There are two blasting booths where steel components are prepared for coating. Steel is occasionally blasted after being painted. There are fabric filters at the blasting booths that exhaust indoors. There are two large ovens for curing and baking, and an annealing oven. There is a third oven in the second building that is used to cure the powder paint. The annealing oven

has a dust collection system. Differential pressure is monitored at all dust collection systems with differential pressure gauges.

Staff Interview:
The Facility typically operates from 5:00 AM to 2:00 PM, Monday through Friday. There are two shifts. In February of 2022, the Facility relocated from 7900 W Tower Ave, Milwaukee, WI 53223 to the current address. There are no storage tanks at the Facility therefore materials are kept in drums and totes. The Facility used 13.8 tons of welding rod in 2021.

Approximately 30 different paints are used at the Facility. The Facility has a VOC limit on the paint booths and maintains a record of paint usage and manometer readings. There are solvents used in the paint booths to flush lines, including paint thinner, methyl ethyl ketone (MEK) and xylene. NESHAP Subpart 6X applies to painting processes using material containing MFHAP above a percent by weight threshold. EPA requested the associated Safety Data Sheets for all paints and solvents used. Facility personnel said that there have been no recent issues with emission control technologies. Dust collection systems at the Facility that do not have differential pressure gauges automatically indicate when to change filters. These filters are changed on a "regular basis".

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:
EPA observed the falk area welding station. There are no emission controls or hoods for capture at the falk area welding station. NESHAP Subpart 6X applies to processes using material containing MFHAP above a percent by weight threshold. EPA requested the associated specification sheets for raw materials and metals used at the Facility. EPA also requested the most recent Industrial Hygiene study results from the Facility.

EPA observed both the 60' and 15' paint booths. The 15' paint booth was in use and the exhaust fan was operating. The fabric filters are on the floor of the paint booths. The differential pressure reading was 1.2" water column (w.c.).

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Notification of Compliance Status for NESHAP Subpart 6X
- 2020 & 2021 Air Emission Reports and their supporting calculations, including throughput data
- Most recent Industrial Hygiene study results
- Most recent stack tests for dust collectors and any other air emission units
- Associated specification sheets for raw materials and metals used at the Facility
- Associated Safety Data Sheets for all solvents used
- Associated Safety Data Sheets for paints used at the Facility
- Safety Data Sheets for welding rods
- Safety Data Sheet for degreaser
- Safety Data Sheets for all thinners

DIGITAL SIGNATURES

Report Author: Pashen, Meaghan Digitally signed by Pashen, Meaghan Date: 2022.10.11 13:45:32 -05'00'

Section Supervisor: Brian Dickens Digitally signed by Brian Dickens Date: 2022.10.12 07:26:52 -05'00'